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*Attorneys for Plaintiffs* UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL ) Case No.: 3:23-cv-06522-MMC  
RECORDS, LLC, CONCORD BICYCLE )  
ASSETS, LLC, CMGI RECORDED MUSIC )  
ASSETS LLC, SONY MUSIC ) **Declaration of Corey Miller in Support of**  
ENTERTAINMENT, and ARISTA MUSIC ) **Plaintiffs' Motion to Compel Discovery**  
  
Plaintiff(s), )  
  
vs. )  
  
INTERNET ARCHIVE, BREWSTER )  
KAHLE, KAHLE/AUSTIN )  
FOUNDATION, GEORGE BLOOD, and )  
GEORGE BLOOD, L.P. )  
  
Defendant(s). )

1 I, Corey Miller, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

2       1. I am a partner at Oppenheim + Zebrak, LLP (“O+Z”), which represents Plaintiffs  
 3 UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded  
 4 Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, “Plaintiffs”) in  
 5 the above-captioned matter.

6       2. I submit this declaration in support of Plaintiffs’ Motion to Compel Discovery  
 7 (“Motion”). I have knowledge of the facts stated herein based on personal knowledge and my  
 8 review of the documents and other items referenced herein. If called upon to do so, I am able to  
 9 testify competently to the matters set forth below.

10      3. In an effort to resolve their discovery disputes, the parties met by videoconference  
 11 on July 29, August 12, and August 14, 2024 for a total of nearly four hours.

12      4. Attached hereto as **Exhibit 1** is a true and correct copy of the parties’  
 13 correspondence on August 2, August 28, and October 1, 2024 (on Plaintiffs’ responses) and  
 14 August 7, September 25, 2024, and October 31, 2024 (on Defendants’ responses).

15      5. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiffs’ December 4,  
 16 2023 letter to Defendants.

17      6. Attached hereto as **Exhibit 3** is a true and correct copy of Defendants’ July 12,  
 18 2024 letter to Plaintiffs.

19      7. Attached hereto as **Exhibit 4** is a true and correct copy of Defendant Kahle-Austin  
 20 Foundation’s September 11, 2024 email to Plaintiffs.

21      8. Attached hereto as **Exhibit 5** is a true and correct copy of Defendant Brewster  
 22 Kahle’s August 21, 2020 email to Ken Doroshow of the Recording Industry Association of  
 23 America.

24 I declare under penalty of perjury that the foregoing is true and correct.

25  
 26 Executed on this 6th day of November 2024.

/s/ Corey Miller  
 Corey Miller

*Counsel for Plaintiffs*